

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Samuel Couch	)	Case No. 16-18013
	)	
Debtor	)	CHAPTER 13
	)	
	)	Judge Jack B. Schmetterer

**NOTICE OF MOTION**

TO:

Tom Vaughn, Trustee (via electronic notice)

United States Trustee (via electronic notice)

Samuel Couch, 9910 S. Normal Ave, Chicago, IL 60628

Evergreen Park Emergency Physicians, 3504 W. 95<sup>th</sup> Street, Evergreen Park, IL, 60805

PLEASE TAKE NOTICE that on February 1, 2017 at 9:30AM or soon thereafter I shall be heard, I shall appear before the Honorable Judge Jack B. Schmetterer, at 219 S. Dearborn St., Courtroom 682, Chicago, IL, and request that the attached motion be granted, at which time you may appear if so desired.

/s/ Charles Portman  
Charles Portman  
Ledford, Wu & Borges, LLC.  
105 W. Madison St., 23<sup>rd</sup> Floor  
Chicago, IL 60602  
312-853-0200

**PROOF OF SERVICE**

I, the undersigned, certify that I caused this Notice and a copy of the attached documents to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 105 W. Madison St., Chicago, IL 60604, on January 6, 2017 before 6:00 p.m., except that the trustee, U.S. Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ Charles Portman  
Charles Portman

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**MOTION TO ALLOW DEBTOR TO FILE LATE CLAIM ON BEHALF OF CREDITOR**

The debtor, by and through counsel, and in support of her Motion to Allow Debtor to File Late Claim on Behalf of Creditor states to the court as follows:

1. The court has jurisdiction over this matter under 28 U.S.C. §§ 1334 and 157.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. The debtor filed a petition for relief and a plan under Chapter 13 of the Bankruptcy Code on May 31, 2016.
4. The plan was confirmed by this Court on July 20, 2016.
5. The bar date for filing a general unsecured claim passed on September 26, 2016 and for filing a governmental entity's unsecured claim passed on November 28, 2016.
6. After the passage of the bar date, the debtor learned that there was a debt owed to Evergreen Park Emergency Physicians in the amount of \$379.00 for Medical Bills.
7. The plan will still complete at the original payment within the permitted sixty month maximum term and the addition of the claim will not reduce the dividend to allowed general unsecured creditors.

WHEREFORE, the debtor requests that the court enter an order permitting the debtor to file a proof of claim on behalf Evergreen Park Emergency Physicians in the amount of \$379.00 within thirty days from the entry of this order and grant the debtor such other relief as just and proper.

Respectfully submitted,

/s/ Charles Portman  
Charles Portman  
Ledford, Wu & Borges, LLC.  
105 W. Madison St., 23<sup>rd</sup> Floor  
Chicago, IL 60602  
312-853-0200

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**ORDER ALLOWING THE DEBTOR TO FILE LATE CLAIM ON BEHALF OF  
CREDITOR**

This cause coming before the court on the debtor's Motion to Allow Debtor to File Late Claim on Behalf of Creditor, all parties having been given notice thereof, and the court being duly advised, IT IS ORDERED BY THE COURT that the debtor is permitted to file a proof of claim on behalf Evergreen Park Emergency Physicians in the amount of \$379.00 within thirty days from the entry of this order.

Dated:

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UNITED STATES BANKRUPTCY JUDGE

Prepared by:

Charles Portman  
Ledford, Wu & Borges, LLC.  
105 W. Madison St., 23<sup>rd</sup> Floor  
Chicago, IL 60602  
312-853-0200